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*Interim Co-Lead Counsel for Plaintiff Class*

13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION

17 IN RE: HIGH-TECH EMPLOYEE  
18 ANTITRUST LITIGATION

19 THIS DOCUMENT RELATES TO:  
20 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF LISA J.  
CISNEROS IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION, PURSUANT TO LOCAL  
RULE 79-5(d), TO SEAL FILINGS  
RELATED TO PLAINTIFFS'  
OPPOSITION BRIEFS RE DKTS. 554,  
556, 557, 559, 560, 561, 564, 570**

1 I, Lisa J. Cisneros, declare:

2 I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a  
3 member of the State Bar of California, and am admitted to practice before the United States  
4 District Court for the Northern District of California. I am one of the counsel for Plaintiffs in this  
5 action. I make this declaration based on my own personal knowledge. If called upon to testify, I  
6 could and would testify competently to the truth of the matters stated herein.

7 1. Below is a list of the documents designated as confidential material, as well as the  
8 identity of the party that has designated the material as confidential. Where Defendants Adobe,  
9 Apple, Google, Intel, Intuit, Lucasfilm and Pixar have designated a document as confidential, I  
10 have stated that all Defendants have done so.

11 **I. Plaintiffs' Consolidated Opposition to Defendants' Joint and Individual Motions for**  
12 **Summary Judgment**

13 2. Plaintiffs brief cites among other things, deposition testimony and documentary  
14 evidence that all Defendants have designated as CONFIDENTIAL or CONFIDENTIAL-  
15 ATTORNEYS' EYES ONLY.

16 **II. Harvey Declaration**

17 3. Exhibit 2: Declaration of Sheryl Sandberg designated Highly Confidential by  
18 Sherly Sandberg.

19 4. Exhibit 3: Declaration of Lauren Stiroh in Support of Defendants' Joint Motion to  
20 Exclude the Expert Testimony of Edward E. Leamer, Dkt. 574, citing data from all Defendants  
21 designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY.

22 5. Exhibits 4-14: Plaintiffs' Expert Reports citing data from all Defendants  
23 designated as Confidential or Confidential-For Attorneys' Eyes only.

24 6. Exhibits 23-28: Defendants' Expert Reports citing data from all Defendants  
25 designated as Confidential or Confidential-For Attorneys' Eyes only.

26 7. Exhibits 33-54: Bates numbered documents designated CONFIDENTIAL or  
27 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Adobe.

28

1           8.       Exhibits 55-75: Bates numbered documents designated CONFIDENTIAL or  
2 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Apple.

3           9.       Exhibits 76-139: Bates numbered documents designated CONFIDENTIAL or  
4 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Google.

5           10.      Exhibits 140-155: Bates numbered documents designated CONFIDENTIAL or  
6 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Intel.

7           11.      Exhibits 156-162: Bates numbered documents designated CONFIDENTIAL or  
8 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Intuit.

9           12.      Exhibits 163-171: Bates numbered documents designated CONFIDENTIAL or  
10 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Lucasfilm.

11          13.      Exhibits 172-187: Bates numbered documents designated CONFIDENTIAL or  
12 CONFIDENTIAL-ATTORNEYS' EYES ONLY by Pixar.

13          14.      Exhibits 195: Apple Inc.'s Amended Responses to Plaintiffs' Second Set of  
14 Interrogatories, dated March 29, 2013, designated Confidential-Attorneys' Eyes Only by Apple.

15          15.      Exhibit 196: Adobe Systems Inc.'s Amended Responses to Plaintiffs' Second Set  
16 of Interrogatories, dated March 19, 2013, designated CONFIDENTIAL-ATTORNEYS' EYES  
17 ONLY by Apple.

18          16.      Exhibit 197: Google Inc.'s Responses to Plaintiffs' Second Set of Interrogatories,  
19 dated, April 6, 2012, designated CONFIDENTIAL-ATTORNEYS' EYES ONLY by Apple.

20          17.      Exhibit 198: Intel's Amended and Supplemented Responses to Plaintiffs' Second  
21 Set of Interrogatories, dated March 12, 2013, designated CONFIDENTIAL-ATTORNEYS'  
22 EYES ONLY by Apple.

23          18.      Exhibit 199: Intuit's Amended and Supplemented Responses to Plaintiffs' Second  
24 Set of Interrogatories, dated April 6, 2012, designated CONFIDENTIAL-ATTORNEYS' EYES  
25 ONLY by Apple.

26          19.      Exhibit 200: Lucasfilm LTD.'s Supplemental Objections and Responses to  
27 Plaintiffs' Second Set of Interrogatories, dated March 25, 2013, designated CONFIDENTIAL-  
28 ATTORNEYS' EYES ONLY by Apple.

20. Exhibit 201: Pixar's Supplemental Objections and Responses to Plaintiffs' Second Set of Interrogatories, dated March 18, 2013, designated CONFIDENTIAL-ATTORNEYS' EYES ONLY by Apple.

**III. Cisneros Declaration**

**A. Deposition Testimony**

21. Exhibits A-H: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Adobe.

22. Exhibits I-T: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Apple.

23. Exhibits U-DD: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Google.

24. Exhibits EE-KK: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Intel.

25. Exhibits LL-QQ: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Intuit.

26. Exhibits RR-WW: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Lucasfilm.

27. Exhibits XX-CCC: Deposition transcripts designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by Pixar.

28. Exhibit DDD: Transcript of December 10, 2013 deposition of Elizabeth Becker, Ph.D. as designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

29. Exhibit EEE: December 3, 2012 deposition of Dr. Kevin Murphy, Ph.D. as designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

30. Exhibit FFF: July 5, 2013 deposition of Dr. Kevin Murphy, Ph.D. as designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

1           31.     Exhibit GGG: December 7, 2013 deposition of Dr. Kevin Murphy, Ph.D. as  
2 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all  
3 Defendants.

4           32.     Exhibit HHH: July 3, 2013 deposition of Kathryn Shaw, Ph.D. as designated  
5 CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

6           33.     Exhibit III: December 7, 2013 deposition of Edward A. Snyder, Ph.D. as  
7 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all  
8 Defendants.

9           34.     Exhibit JJJ: December 9, 2013 deposition of Lauren Stiroh, Ph.D. as designated  
10 CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

11          35.     Exhibit KKK: December 8, 2013 deposition of Eric L. Talley, J.D., Ph.D. as  
12 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all  
13 Defendants.

14          36.     Exhibit LLL: October 26, 2012 deposition of Edward Leamer, Ph.D. as designated  
15 CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

16          37.     Exhibit MMM: June 11, 2013 deposition of Edward Leamer, Ph.D. as designated  
17 CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

18          38.     Exhibit NNN: November 18, 2013 deposition of Edward Leamer, Ph.D. as  
19 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all  
20 Defendants.

21          39.     Exhibit OOO: December 19, 2013 deposition of Edward E. Leamer, Ph.D. as  
22 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all  
23 Defendants.

24          40.     Exhibit PPP: June 7, 2013 deposition of Dr. Kevin Hallock, Ph.D. as designated  
25 CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all Defendants.

26          41.     Exhibit QQQ: November 15, 2013 deposition of Matthew Marx, Ph.D. as  
27 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES ONLY by all  
28 Defendants.

1           **B.     Deposition Exhibits**

2           42.     The exhibits attached to the Cisneros Declaration are designated as Confidential or  
3 Confidential – Attorneys’ Eyes Only, as follows.

4           43.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
5 “Adobe” are designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS’ EYES ONLY  
6 by Adobe.

7           44.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
8 “APPLE” are designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS’ EYES  
9 ONLY by Google.

10          45.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
11 “GOOG-HIGH-TECH” are designated as CONFIDENTIAL or CONFIDENTIAL-  
12 ATTORNEYS’ EYES ONLY by Google.

13          46.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
14 “DOC” are designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS’ EYES ONLY  
15 by Intel.

16          47.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
17 “INTUIT” are designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS’ EYES  
18 ONLY by Intuit.

19          48.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
20 “LUCAS” are designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS’ EYES  
21 ONLY by Lucasfilm.

22          49.     All cardinal numbered exhibits that contain Bates stamp numbers that include  
23 “PIX” are designated as CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS’ EYES ONLY  
24 by Pixar.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Executed this 6th day of February, 2014, in San Francisco, California.

4 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

5  
6 By: /s/ Lisa J. Cisneros  
Lisa J. Cisneros